

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION

ROBERT B. LOVE, M.D.,

Case No.: 15-CV-650

Plaintiff,

v.

MEDICAL COLLEGE OF WISCONSIN, INC.,
FROEDTERT MEMORIAL LUTHERAN
HOSPITAL, INC., ALFRED C. NICOLosi,
M.D., PAUL S. PAGEL, M.D., DAVID C.
WARLTIER, M.D. and LARRY
LINDENBAUM, M.D.,

Defendants.

MCW'S MOTION FOR SANCTIONS AGAINST PLAINTIFF

The Medical College of Wisconsin, Inc. ("MCW") moves the Court for sanctions per 28 U.S.C. §1927 against Plaintiff Counsel.

Plaintiff Counsel filed a frivolous motion against MCW and unilaterally cancelled Dr. Tweddell's deposition. As a result, MCW incurred the costs of defending the motion and the costs related to the cancellation of Dr. Tweddell's deposition, including airfare to Cincinnati.

These grounds are explained in MCW's Brief opposing Plaintiff's Motion for Sanctions and the accompanying Declarations.

Dated this 28th day of August, 2018.

/s/ Michael P. Malone

Michael P. Malone [State Bar No. 1015463]
Thomas R. Schrimpf [State Bar No. 1018230]
Defendants, Medical College of Wisconsin,
Inc., Alfred C. Nicolosi, M.D., David C.
Wartier, M.D. and Larry Lindenbaum, M.D.
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